

Without waiving these objections, please see responsive documents which will follow separately.

24. Please produce all policy manuals, procedure manuals or other documents which address your policies, practices or procedures in the investigation or reinvestigation of credit data which is disputed as inaccurate by a consumer.

RESPONSE: Objection. Defendant objects to this request as unduly burdensome, overly broad and not reasonable calculated to lead to the discovery of admissible evidence because it seeks discovery of all policy manuals, procedure manuals or other documents which address Ocwen's policies, practices or procedures in the investigation or reinvestigation of credit data which is disputed as inaccurate by a consumer, including those manuals or other documents which are wholly irrelevant to the claims and defenses in this suit (in particular because the request is not limited to indirect credit disputes). Defendant objects to this request as being overly broad in duration as it seeks discovery for a period beginning in January 2000 and continuing through the present, and the earliest allegation relating to credit reporting is March 2013. Finally, Defendant also objects because this request seeks confidential and proprietary commercial or business information and no mutually agreeable protective order has been entered by the Court.

25. Please produce all policy manuals, procedure manuals or other documents, which address your policies, practices or procedures in correcting, updating, modifying and/or deleting or suppressing credit data or historical address data which is disputed as inaccurate.

RESPONSE: Objection. Defendant objects to this request as unduly burdensome,

overly broad and not reasonable calculated to lead to the discovery of admissible evidence because it seeks discovery of all policy manuals, procedure manuals or other documents, which address your policies, practices or procedures in correcting, updating, modifying and/or deleting or suppressing credit data or historical address data which is disputed as inaccurate, including those manuals or other documents which are wholly irrelevant to the claims and defenses in this suit (in particular because the request is not limited to indirect credit disputes). Defendant objects to this request as being overly broad in duration as it seeks discovery for a period beginning in January 2000 and continuing through the present, and the earliest allegation relating to credit reporting is March 2013. Finally, Defendant also objects because this request seeks confidential and proprietary commercial or business information and no mutually agreeable protective order has been entered by the Court.

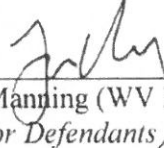
26. Please produce copies of any and all telephone reinvestigation forms which in any way reference Plaintiff, Plaintiffs social security number or any allegation or defense asserted in this action.

RESPONSE: Objection. Defendant objects because “telephone investigation form” is vague and ambiguous because undefined. Defendant objects to this request as unduly burdensome, overly broad and not reasonable calculated to lead to the discovery of admissible evidence because it seeks discovery of all telephone reinvestigation forms which in any way reference Plaintiff, Plaintiffs social security number or any allegation or defense asserted in this action, including those manuals or other documents which are wholly irrelevant to the claims and defenses in this suit. Defendant objects to this request as being

including information which is wholly irrelevant to the claims and defenses in this suit. Defendant objects to this request as being overly broad in duration as it seeks discovery for a period beginning in January 2000 and continuing through the present, and the earliest allegation relating to credit reporting is March 2013. Defendant also objects to producing "computer screens" as this phrase is vague and ambiguous because undefined and overly burdensome some because irrelevant. Finally, Defendant also objects because this request seeks confidential and proprietary commercial or business information and no mutually agreeable protective order has been entered by the Court.

Dated: January 30, 2015

OCWEN LOAN SERVICING, LLC

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